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**IRONHOUSE SANITARY DISTRICT**  
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October 12, 2018

Ms. Dania Jimmerson  
Water Resources Control Engineer  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Dr, Ste 200  
Rancho Cordova, CA 95670

*Via email only: [RB5S-NPDES-Comments@waterboards.ca.gov](mailto:RB5S-NPDES-Comments@waterboards.ca.gov)*

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**SUBJECT: IRONHOUSE SANITARY DISTRICT WATER RECYCLING FACILITY –  
TENTATIVE ORDER NPDES PERMIT NO. CA0085260**

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Dear Ms. Jimmerson:

The Ironhouse Sanitary District (ISD or District) has reviewed the Tentative Order (TO) issued by the Central Valley Regional Water Quality Control Board (Regional Water Board) on September 14, 2018. The following comment is submitted prior to the October 15, 2018, deadline to be considered for inclusion in the final adopted NPDES permit for the ISD Water Recycling Facility. For requested revisions to the text of the TO, underline is shown for suggested additions, and ~~strike-out~~ is shown for suggested deletions.

**Provisions and Requirements Implementing State Law**

Finding II.C of the TO (page 3) lists sections of the NPDES permit that are implementing state-law only. The District believes the finding is incomplete and requests the following provisions be added to this section: III.D, VI.C.4, and VI.C.5 and the paragraph revised as follows:

**C. Provisions and Requirements Implementing State Law.** The provisions/requirements in subsections III.D, IV.B, IV.C, ~~and~~ V.B, VI.C.4, and VI.C.5 are included to implement state law only. These provisions/requirements are not required or authorized under the federal CWA; consequently, violations of these provisions/requirements are not subject to the enforcement remedies that are available for NPDES violations.

The District appreciates the Regional Water Board staff's efforts towards reissuance of the NPDES permit. Thank you for your consideration of our comments. Please do not hesitate to contact me at [davisson@isd.us.com](mailto:davisson@isd.us.com) or (925) 809-3001 if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink that reads "Chad Davisson". The signature is written in a cursive, flowing style with a long horizontal line extending from the end of the name.

Chad Davisson  
General Manager

cc: Chris Christean, Water Recycling Facility Plant Manager  
Denise Conners, Larry Walker Associates